



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

NOV 24 2004

VIA FACSIMILE

Steven S. Lucas, Esq.
Neilsen, Merksamer, Parrinello, and Naylor, LLP
591 Redwood Highway #4000
Mill Valley, CA 94941-3039

RE: MUR 5020
Mirage Casino Resorts, Inc.
Punam Mathur
Richard "Skip" Bronson
Mark Juliano

Dear Mr. Lucas:

On October 3, 2001, the Federal Election Commission found reason to believe that your client, Mirage Casino Resorts, Inc., violated 2 U.S.C. § 441b(a). At your request, on November 18, 2004, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement with Mirage Casino Resorts, Inc. that the Commission has approved in settlement of the matter. If your client agrees with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

On November 18, 2004, the Federal Election Commission found that there is reason to believe that your client, Punam Mathur, violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of receipt of this letter. Where appropriate, statements should be submitted under oath. In the absence of additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved. If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation, and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. We would not object to including Ms. Mathur and Mirage Casino Resorts, Inc. in a joint agreement. Please let us know if this is of interest to you.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

This matter with Ms. Mathur will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public

After considering the circumstances of the matter concerning Richard "Skip" Bronson and Mark Juliano, the Commission determined on November 18, 2004, to take no further action against Mr. Juliano and Mr. Bronson and closed the file as it pertains to them. Mr. Juliano and Mr. Bronson are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect, and that this matter is still open with respect to other respondents. The Commission will notify you when the entire file has been closed.

If you have any questions or suggestions for changes in the agreements, or if you wish to arrange a meeting in connection with mutually satisfactory conciliation agreements, please contact Delbert K. Rigsby, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,



Scott E. Thomas
Commissioner

Enclosure

Conciliation Agreement with Mirage Casino Resorts, Inc.
Conciliation Agreement with Punam Mathur
Factual and Legal Analysis - Punam Mathur